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**From:** Dan Walsh  
**Sent:** Thursday, January 11, 2024 11:48 AM  
**To:** 'Brother EL'  
**Cc:** Cheri Brown; Jessica Kimball; Phillip Jackson  
**Subject:** RE: [EXT]Re: Hesed-El v. Bryson et al \_ Availability for Defendants' Depositions

Mr. Hesed-El:

Thank you for your email regarding the deposition dates for the defendants in the ongoing matter.

Additionally, I would like to schedule depositions for your expert witness, Dr. Leonard J. Weiss, and for Sheik S. Johns-El and Sheik C. Barnes-Bey. Given the nature of the testimony expected from Dr. Weiss, I will need to conduct his deposition in person. However, for Sheik S. Johns-El and Sheik C. Barnes-Bey, remote depositions via secure video conferencing is acceptable. Additionally, given that you are out of the country, I am amenable to you participating in all three depositions remotely, but you will have to bear whatever costs are incurred for your remote deposition services. Could you please provide potential dates for these depositions, no later than February 10, 2023?

Your cooperation in these matters is greatly appreciated. I look forward to your prompt response to facilitate the smooth progress of discovery.

Respectfully,  
Dan Walsh

Daniel H. Walsh  
Attorney | Roberts & Stevens, P.A.  
City Centre Building | 301 College Street, Suite 400, Asheville, NC 28801  
Office: 828-252-6600 | Direct: 828-210-6818  
[www.roberts-stevens.com](http://www.roberts-stevens.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:21-cv-305

TAQI EYR HHAMUL HESED EL, a/k/a  
"Bro. T. Hesed-El",

Patient,

v.

ROBIN BRYSON and Mission Hospital,  
Inc.,

Defendants.

**NOTICE OF VIDEOTAPED**  
**DEPOSITION OF**  
**DR. LEONARD WEISS**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, the defendants in the above-referenced matter intend to take the oral deposition of Plaintiff's Expert Witness, Dr. Leonard Weiss, at Dr. Weiss's office located at 3006 Bee Cave Rd., Suite D208, Austin, TX 78746. The deposition is scheduled to commence at 8:00 a.m. on February 8, 2024, and continue/resume at 10:00 am on February 9, 2024. The deposition will be taken upon oral examination in accordance with Federal Rules of Civil Procedure and may be videotaped. The deposition will be taken before a notary public or some other officer duly authorized by law to take depositions. The oral examination and possible videotaping will continue from day to day until its completion.

This the 29<sup>th</sup> day of January, 2024,

/ s/ Phillip T. Jackson

N.C. Bar No. 21134

/ s/ Daniel H. Walsh

N.C. Bar No. 57543

*Attorneys for Mission Defendants*

ROBERTS & STEVENS, P.A.

Post Office Box 7647

Asheville, North Carolina 28802

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[pjackson@roberts-stevens.com](mailto:pjackson@roberts-stevens.com)

[dwalsh@roberts-stevens.com](mailto:dwalsh@roberts-stevens.com)

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing document was served upon the all parties in the above entitled action via email and by depositing a copy, contained in a first-class postage-paid wrapper, into a depository under the exclusive care and custody of the United States Postal Service, addressed as follows:

Bro. T. Hesed-El  
c/o Taqi El Agabey Mgmt.  
30 North Gould Street, Suite R  
Sheridan, WY 82801  
teamwork3@gmail.com

This 29<sup>th</sup> day of January, 2024.

By: /s/Daniel H. Walsh  
Daniel H. Walsh

**From:** Brother EL <teamwork3@gmail.com>  
**Sent:** Tuesday, February 6, 2024 7:32 PM  
**To:** Dan Walsh  
**Cc:** Cheri Brown; Jessica Kimball; Phillip Jackson  
**Subject:** [EXT]Re: [EXT]Re: Update: Hesed-El v. Bryson, et al \_ Dr. Weiss' Deposition

Mr. Walsh,

I spoke with Dr. Weiss's office about 30 minutes ago. Unfortunately, we must cancel this week's deposition as Dr. Weiss is still in the hospital and it is not known when he will be discharged. I will keep you updated as new information becomes available with the hopes that we will be able to reschedule his deposition soon. As for his remaining disclosures under Rule 26, Dr. Weiss's office manager should be able to provide that document by the end of the day tomorrow.

If you have any questions in the meantime, please let me know. Thank you.

Respectfully,

Brother T. Hesed-El  
[teamwork3@gmail.com](mailto:teamwork3@gmail.com)  
470-918-2585

**From:** Dan Walsh  
**Sent:** Thursday, February 15, 2024 6:12 PM  
**To:** 'Brother EL'  
**Cc:** Cheri Brown; Jessica Kimball; Phillip Jackson  
**Subject:** RE: [EXT]Re: [EXT]Re: [EXT]Re: [EXT]Re: [EXT]Re: [EXT]Hesed-El v. Bryson, et al: Notice of Deposition and Follow-up on Rule 30(b)(6) Meet and Confer

Mr. Hesed-El,

We conducted a meet and confer today wherein the following communications were made:

- 1) Deposition of Sheik Johns-El is preliminarily scheduled for Feb. 26 from 4 to 8 pm, but this requires confirmation from him.

- 5) Dr. Weiss continues to be unavailable due to emergent medical concerns. In the event he cannot be a witness you may seek alternate experts, however, you understand that this would require motion practice. Alternatively, you are checking if next week is a possibility for the purposes of a deposition and will let me know asap due to the short timeframe involved.

Please let me know if there's any information here which is incomplete or incorrect.

Thanks,  
Dan Walsh

Daniel H. Walsh  
Attorney | Roberts & Stevens, P.A.  
City Centre Building | 301 College Street, Suite 400, Asheville, NC 28801  
Office: 828-252-6600 | Direct: 828-210-6818  
[www.roberts-stevens.com](http://www.roberts-stevens.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:21-cv-305

TAQI EYR HHAMUL HESED EL, a/k/a  
"Bro. T. Hesed-El",

Patient,

v.

ROBIN BRYSON and Mission Hospital,  
Inc.,

Defendants.

**NOTICE OF VIDEOTAPED**  
**DEPOSITION OF**  
**DR. LEONARD WEISS**

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, the defendants in the above-referenced matter intend to take the oral deposition of Plaintiff's Expert Witness, Dr. Leonard Weiss, at Dr. Weiss's office located at 3006 Bee Cave Rd., Suite D208, Austin, TX 78746. The deposition is scheduled to commence at 4:00 p.m. local time (5 p.m. eastern time) on February 24, 2024, and continue/resume at 4:00 p.m. local time (5 p.m. eastern time) on February 25, 2024. The deposition will be taken upon oral examination in accordance with Federal Rules of Civil Procedure and may be videotaped. The deposition will be taken before a notary public or some other officer duly authorized by law to take depositions. The oral examination and possible videotaping will continue from day to day until its completion.

This the 19<sup>th</sup> day of February, 2024,

/ s/ Phillip T. Jackson

N.C. Bar No. 21134

/ s/ Daniel H. Walsh

N.C. Bar No. 57543

*Attorneys for Mission Defendants*

ROBERTS & STEVENS, P.A.

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[pjackson@roberts-stevens.com](mailto:pjackson@roberts-stevens.com)

[dwalsh@roberts-stevens.com](mailto:dwalsh@roberts-stevens.com)

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing *Notice of Appearance* was served upon the all parties in the above entitled by depositing a copy, contained in a first-class postage-paid wrapper, into a depository under the exclusive care and custody of the United States Postal Service, addressed as follows:

Bro. T. Hesed-El  
c/o Taqi El Agabey Mgmt.  
30 North Gould Street, Suite R  
Sheridan, WY 82801

This 19<sup>th</sup> day of February, 2024.

ROBERTS & STEVENS, P.A.

/s/ Daniel H. Walsh  
Daniel H. Walsh



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**  
Civil Action No. 1:21-cv-305-MR-WCM

BROTHER T. HESED-EL,	)	
	)	
Plaintiff,	)	
v.	)	DESIGNATION OF EXPERT WITNESS
	)	PURSUANT TO RULE 26(a)(2)(D)(ii)
ROBIN BRYSON, et al.,	)	
	)	
Defendants.	)	
	)	

COMES NOW, Plaintiff Brother T. Hesed-El (“Plaintiff”) pursuant to the notice of designation email sent to Defendants’ counsel on February 18, 2024. As stated in the email, Plaintiff has retained and designated Sheik S. Johns El as an expert witness that Plaintiff expects to call at the trial of this matter. Sheik S. Johns El provided mental health counseling services to Plaintiff from 2021 to 2023 and is an expert in the religion, culture, and remedies of the Moorish Science Temple of America, as founded by Prophet Noble Drew Ali in 1913. Sheik S. Johns El will provide a report pursuant to Rule 26(a)(2)(D)(ii) of the Federal Rules of Civil Procedure.

Respectfully, this 12<sup>th</sup> day of Sha’ban in the year 1445 A.H.

/s/ Brother T. Hesed-El, ARR  
**Bro. T. Hesed-El, Plaintiff pro se**  
c/o TAQI EL AGABEY MANAGEMENT  
30 N Gould St, Ste. R, Sheridan, WY 82801  
Ph: (762) 333-2075 / [teamwork3@gmail.com](mailto:teamwork3@gmail.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this DESIGNATION OF EXPERT WITNESS PURSUANT TO RULE 26(a)(2)(D)(ii) was electronically served upon defendants' counsel, by attachment to an email, to ensure delivery to:

**Robin Bryson and Mission Hospital Inc.**

% Attorney Daniel H. Walsh  
ROBERTS & STEVEN, P.A.  
Post Office Box 7647  
Asheville, North Carolina 28802  
dwalsh@roberts-steven.com

February 22, 2024

/s/ Brother T. Hesed-El, ARK  
**Bro. T. Hesed-El, Plaintiff *pro se***

**From:** Brother EL <teamwork3@gmail.com>  
**Sent:** Saturday, February 24, 2024 10:22 AM  
**To:** Dan Walsh  
**Cc:** Cheri Brown; Jessica Kimball; Phillip Jackson  
**Subject:** [EXT]Dr. Weiss' Health Complications

Mr. Walsh,

I just received a text message from Dr. Weiss's personal assistant, Adrienne. Dr. Weiss is en route to the emergency room. I called Adrienne and she informed me that Dr. Weiss cannot sit for his deposition today. It is unknown whether he will be able to reschedule. I've requested documentation regarding his emergency room visit and will provide you with a copy upon receipt.

I called you and left a voicemail regarding the above. Please call me back when you can. Thank you.

Respectfully,

Brother T. Hesed-El  
[teamwork3@gmail.com](mailto:teamwork3@gmail.com)  
470-918-2585

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
CIVIL ACTION NO. 1:21-cv-305

TAQI EYR HHAMUL HESED EL, a/k/a  
"Bro. T. Hessed-El"

PATIENT,

v.

ROBIN BRYSON and Mission Hospital,  
Inc.,

DEFENDANTS.

\_\_\_\_\_ /

DEPOSITION OF SHEIK JOHNS EL  
APPEARING REMOTELY FROM  
LOS ANGELES COUNTY, CALIFORNIA

FEBRUARY 26, 2024

4:00 P.M.

REPORTED BY:

VERONICA I. PEREZ

CSR

APPEARING REMOTELY FROM MECKLENBURG COUNTY, NORTH CAROLINA

1 questions, probably two or three at most.

2 BY MR. WALSH:

3 Q. First, just to confirm that I asked this, you never  
4 diagnosed Brother El with a mental illness; correct?

5 A. Correct.

6 Q. Second, you never discussed with Brother El anything  
7 that occurred between my clients, who I've previously identified  
8 and himself; correct?

9 A. Correct.

10 MR. WALSH: No other questions.

11 MR. HESED-EL: Do I get a redirect?

12 MR. WALSH: Yeah. You can --

13 MR. HESED-EL: Okay.

14 MR. WALSH: Redirect based on --

15 MR. HESED-EL: I have one redirect -- one redirect.

16 BY MR. HESED-EL:

17 Q. Sheik Johns El?

18 A. Yes.

19 Q. Do you recall at any time prior to this deposition  
20 Brother T. Hesed-El emailing you a copy of a expert opinion or  
21 from a doctor named Dr. Wise or any medical records for review?

22 A. Dr. Wise? I have to -- I have to bring that back to  
23 my memory. There's been a lot.

24 Q. That's fine. Well, you can supplement your answer  
25 later.

1 STATE OF NORTH CAROLINA )  
2 COUNTY OF MECKLENBURG )  
3

4 I, Veronica I. Perez, a Certified Shorthand Reporter,  
5 do hereby certify:

6 That prior to being examined, the witness in the  
7 forgoing proceedings was by my duly sworn to testify to the  
8 truth, the whole truth, and nothing but the truth;

9 That said proceedings were taken remotely before me at  
10 the time and places therein set forth and were taken down by me  
11 in shorthand and thereafter transcribed into typewriting under  
12 my direction and supervision;

13 I further certify that I am neither counsel for, nor  
14 related to, any party to said proceedings, not in anywise  
15 interested in the outcome thereof.

16 In witness whereof, I have hereunto subscribed my  
17 name.  
18

19 Dated: February 26, 2024  
20

21   
22

23 Veronica I. Perez  
24 CSR  
25

**From:** Brother EL <teamwork3@gmail.com>  
**Sent:** Tuesday, February 27, 2024 7:34 PM  
**To:** Dan Walsh  
**Cc:** Jessica Kimball; Phillip Jackson; Cheri Brown  
**Subject:** [EXT]Designation of Expert Witness \_ Ryan Kaufman, M.D.  
**Attachments:** 2024.02.27 Designation of Expert Witness Ryan Kaufman, MD.pdf

Mr. Walsh,

Please find the attached designation of Dr. Kaufman as an expert witness. Thanks.

Respectfully,

Brother T. Hesed-El  
[teamwork3@gmail.com](mailto:teamwork3@gmail.com)  
470-918-2585